WHOLESALE FOOD WAREHOUSE
RISK CONTROL PLAN
WORKBOOK

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San Diego County
Department of Environmental Health
Food and Housing Division

The San Diego County Department of Environmental Health Food and Housing Division seeks to enhance the quality of life by promoting public health and safety for the residents and visitors to San Diego County. Our commitment is embedded in our goals and objectives and includes providing the greatest opportunity for reducing health disparities community wide.

One of the Food and Housing Division's main goals is to reduce the number of foodborne illnesses in San Diego County. We plan on working toward this goal by focusing our efforts on risk factors that can lead to foodborne illness in food facilities and by working to improve food employee behaviors and food preparation practices that directly relate to foodborne illness in food establishments.

This guidance document* is designed to provide Wholesale Food Warehouse Operators with information on how to develop and implement a risk control plan. A risk control plan helps to identify and mitigate food safety and security risks. It also helps to prepare wholesale food warehouse operators to quickly and efficiently respond to recalls. In general, a risk control plan includes procedures for addressing the following areas:

1. Temperature Control
2. Approved Food Sources
3. Food Storage
4. Receiving, Transportation, and Delivery
5. Food Security
6. Food Recalls
7. Traceback/Traceforward Procedures
8. Employee Practices
9. Sanitation
10. Pest/Vermin Control
11. Self-Inspection/Verification
12. Recordkeeping

Wholesale food warehouse operators are encouraged to use the general recommendations in this guidance to tailor food safety practices appropriate to their particular operations.

Please note that this document is intended to be a guideline and may not be all-inclusive for every situation.

Wholesale Food Warehouse Workbook
Table of Contents

Temperature Control Procedures Worksheet

I. Temperature Control Logs

Temperature Control Procedures are intended to ensure that perishable/potentially hazardous foods (PHF) are held at proper temperatures to maintain quality and safety. Temperature control logs, or equivalent methods, need to be kept for the following:

a. Each refrigeration/cooler unit:
Record temperatures at the beginning of each day and every four hours while open for business (see sample temperature control log). A continuous read system with alarm capacity is recommended for refrigeration/cooler units and can be used in lieu of temperature control logs. In this case, a manual check should be made at the beginning of each shift to verify the system is working.

b. Receiving temperatures of PHF:
Record temperature PHF received with each shipment. Have a receiving log, note temperature on the invoice/shipping document (see sample receiving log), or other suitable method.

c. Temperature of transportation vehicles used to transport PHF:
Record temperature inside pre-cooled truck (prior to loading) on a log or on the invoice/shipping document (see sample temperature control log), or other suitable method.

d. Temperature of PHF at the time of delivery at the retail food facility or other distribution center:
Record temperature of PHF delivered. Record on a shipping log or on the invoice/shipping document (see sample shipping log).

II. Calibration Logs

Procedures for calibrating temperature-recording devices are important to ensure accuracy. The manufacturer's instructions should be followed. Temperature measuring devices should be accurate to plus or minus two degrees Fahrenheit. Devices such as metal probe thermometers should be calibrated at least once per week or replaced by a newly calibrated thermometer. A calibration log must be kept on file (see thermometer calibration procedures and sample calibration log). It is important to note that a probe thermometer must be replaced with a newly calibrated thermometer any time it is dropped, shaken, or otherwise had it's accuracy compromised.

III. Written Procedures

Written procedures should include (at a minimum):

a. Person/position that will record temperatures:_____

b. Person/position that will conduct calibration: _____

c. What foods (or truck refrigerated compartments) will temperatures be recorded:___

_____

_____

d. When will temperatures be recorded:_____

_____

_____

e. How will temperatures be logged:_____

_____

f. What temperature recording devices will be calibrated or verified in- house and which, if any, will need calibration by the manufacturer or authorized service representative:_____

_____

_____

g. When will each temperature recording device be calibrated:_____

_____

_____

h. How will in-house temperature recording devices be calibrated:_____

_____

i. Where will temperature and calibration logs be kept:_____

_____

j. What is your procedure for sanitizing thermometers (i.e., alcohol wipes):_____

_____

Thermometer Calibration

Food temperature measuring devices must be calibrated in accordance with the manufacturer's specifications as often as necessary to ensure their accuracy. Additionally, a record log should be kept of your thermometer calibrations. A sample log is attached.

If a thermometer does not have specific instructions for calibration, the following methods may be used.

I.   Ice Point Method

1. Fill a large container with ice, preferably crushed if you have it. Add clean tap water until the container is full. Stir ice water mixture.

2. Put the thermometer probe into the ice water so that the sensing area, usually about an inch up on a bimetallic thermometer, is completely submerged. Don't let the probe touch the sides or bottom of the container. Wait 30 seconds, or until the temperature indicator stops moving.

3. On bimetallics, hold the calibration nut on the underside of the dial head securely with a wrench- or the tool attached to the sheath-and rotate the dial head until the thermometer reads 32°F (0°C).

II.   Boiling Point Method

1. Bring clean tap water to a boil in a deep pan.

2. Put the thermometer probe into the boiling water so that the sensing area is completely submerged. Again, don't let probes touch the sides or bottom of the pan. Wait 30 seconds, or until the temperature indicator stops moving.

3. On bimetallics, hold the calibration nut on the underside of the dial head securely with a wrench or tool attached to the sheath and rotate the dial head until the thermometer reads 212°F (100°C) or the appropriate boiling point for your elevation.

A. Calibration Nut

B. Dimple

C. Sensing Area
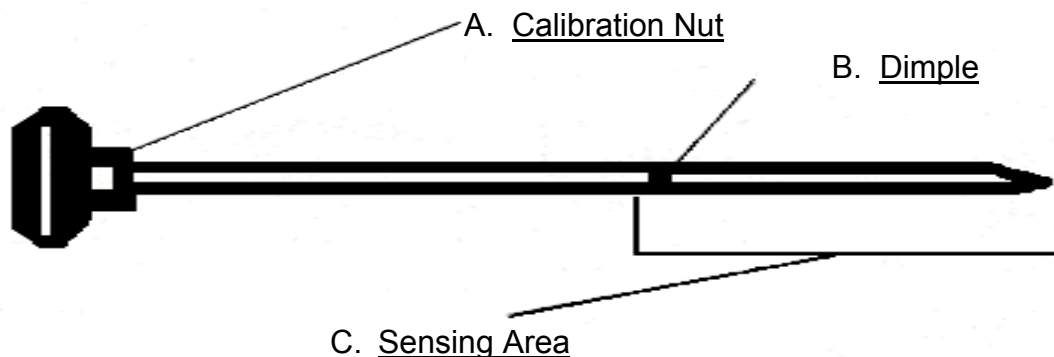
(It is recommended that thermometers be calibrated or replaced with a new thermometer weekly)

(Sample) Thermometer Calibration Log

Date/Time	Thermometer ID#	Calibration Method	Comments	Initials
6/17/04	34	Ice Point method		J.G.

(SAMPLE) TEMPERATURE LOG

Employee Name (Nombre Del Empleado)	Date (Fecha)	Time (Hora)	Temperature (Temperatura)	Type of Food (Tipo de Comida)	Location (Lugar)	Corrective Action (Que Fue Corregido)

Notes

Verifying Approved Sources Worksheet

I. System for Verifying Approved Food Sources

It is important to have a system in place to ensure your food sources meet or exceed regulatory standards. The following are some suggested methods of verifying food that you are receiving and distributing comes from an approved source:

a. Evidence of regulatory oversight (last inspection report, state or federal registration/license, local health permit),
b. Third party audit results (e.g. NSF or AIB),
c. Self-certification (guarantee) based on HACCP or other risk control system,
d. USDA Mark on meat and poultry items,
e. Copy of a distributors food safety compliance guarantee from their suppliers,
f. Laboratory testing results,
g. Man-in-plant verification (some chain facilities monitor food they buy),
h. Certification of adherence to Good Agricultural Practices (for produce),
i. USDC approved list of establishments (seafood) http://seafood.nmfs.noaa.gov
j. Listing in Interstate or California Shellfish Shippers Listing (molluscan shellfish) www.dhs.ca.gov\fdb or www.ISSC.org
k. Shellfish tags (molluscan shellfish)
l. Gulf oyster treatment process verification

II. Written Procedures

Written procedures should include (at a minimum):

a. Who will verify approved sources:_____

b. What records will be kept as evidence of approved sources:_____

_____

c. What will you provide your customers with as an assurance of safety:_____

_____

d. When and how often will you ask for verification of approved source from your suppliers:_____

e. Where will records be kept:_____

Notes

Food Storage Procedures Worksheet

I. Self-Inspection and Written Procedures

Food must be stored so it is protected from pests and contamination. Additionally, if certain foods are not stored properly, microorganisms can grow. In order to protect foods, written procedures to ensure safe food storage should include (at a minimum):

a. Providing adequate storage space.

b. Storing nonfood items (including chemical and cleaning items) separate from food.

c. Securing poisonous/toxic chemicals not held for sale

d. Separating raw animal foods from ready-to-eat foods

e. Protecting foods from contamination (proper packaging and coverage).

f. Providing a separate and labeled storage area for salvage items.

g. Implementing procedures for handling salvaged, expired, damaged, or contaminated foods (include timely disposal of damaged, spoiled, or expired products). Disposition of these food items must also be documented.

h. Rotating stock to ensure First In – First Out (FIFO).

i. Providing adequate lighting and ventilation.

j. Assuring food received is labeled.

k. Cleaning and organizing food storage areas.

l. Maintaining proper food storage temperatures.

m. Maintaining an unobstructed, clearly delineated, space that is 12 to 18 inches between both interior and exterior walls and stored items.

n. Storing food off the floor and easily movable by pallet jacks, forklifts or other similar devices.

II. Written Procedures Worksheet

The items listed above should be included in the facility's monthly self-inspection procedure (see sample self-inspection procedure worksheet). The written procedures developed for the food warehouse should include (at a minimum):

a. Who is responsible for ensuring compliance with food storage procedures:_____

_____

b. What procedures will you implement to ensure compliance with each of the items listed above:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

III.   Records

How will you document, and where will you store the following records:

a. Monthly self-inspection report:_____

b. Disposition of salvaged, expired, damaged, or contaminated foods:_____

_____

Notes

Receiving, Transportation, and Delivery
Procedures Worksheet

I.   Written Procedures for Receiving

Written procedures must include (at a minimum):

a. Checking in deliveries. Do not allow unattended deliveries.

Who is responsible for checking in deliveries:_____

b. Keeping copies of invoices/shipping documents.

What documents will be kept:_____ _____

Where will the documents be kept:_____

c. Inspecting deliveries for tampering, discoloration, pinholes, leakage, unusual packages, contamination (rodent activity or insects), and safe temperatures (see sample receiving log). Also note the condition of delivery vehicle (clean, good repair, safe temperature, no insects, no rodent droppings, and no meat juices on the floor). Having a security tag or "chain of custody" is good practice for wholesalers to consider implementing.

Who is responsible for inspecting deliveries:_____

What will be checked when foods are received at the food warehouse, transported from the food warehouse, and delivered to other food facilities (see above for guidance):_____

_____

_____

What records (logs) will be kept:_____

d. Substandard food items. A record should be kept of rejected food items (see sample receiving log).

What corrective actions will be taken if foods received at the food warehouse do not meet the standards in your plan:_____

_____

_____

How will corrective actions be documented:_____

_____

e. Reconciling amount of product received with that ordered.

How will you reconcile amount received with amount ordered:_____

_____

f. Notifying law enforcement and public health if evidence of tampering is found.

When will staff need to notify law enforcement and public health:_____

_____

II. Written Transportation Procedures:

Written procedures must include (at a minimum):

a. Pre-cooling truck refrigeration compartments used to transport PHF.

Who is responsible for transportation:_____

How far a head of time will your trucks be cooled before loading:_____

_____

What temperature will they be pre-cooled to:_____

b. Documenting temperature in the truck refrigeration compartment prior to loading.

Who will check temperature and sanitation of transportation vehicles prior to loading and how will that be documented:_____

_____

c. Keeping shellfish tags and treatment certifications with each batch.

If applicable, what is your procedure for ensuring molluscan shellfish tags are kept with each delivery:_____

_____

Do you distribute Gulf oysters during April – October? If so, do your procedures include distributing treated Gulf oysters:_____

_____

d. Ensuring transport vehicle compartments are clean, sealed, and secured.

What are your procedures for ensuring food compartments are clean, sealed, and secured:_____

_____

_____

e. Documenting temperature of PHF prior to loading.

What are your procedures for documenting temperatures of PHF prior to loading:___

_____

III. Written Delivery Procedures:

Written procedures must include (at a minimum):

a. Never conducting unattended deliveries (ensure delivery is accepted by receiving facility personnel).

What are your procedures for ensuring deliveries are not unattended:_____

_____

b. Handling items removed from cases.

If company policy permits the break down of cases for food delivery or sale, what procedures will you implement to trace items removed from cases and delivered to various facilities:_____

_____

c. Unloading foods with frozen first, refrigerated second, and dry goods last is a good practice. Transporting and delivering produce must also be conducted with care so it is not damaged.

What are your loading and delivery procedures:_____

_____

   d. Documenting temperature of PHF (and if frozen food is frozen) at time of delivery (log or note on invoice/shipping document).

   Who will check temperature of PHF at time of delivery at the retail food facility, or other food warehouse, and how will that be documented:_____

_____

   e. Proper handling of returned foods to ensure food safety.

   What are your procedures for handling returned food items:_____

_____

IV.   Records:

   a. Temperature of PHF and condition of food received and delivered.
   b. Temperature of pre-cooled refrigerated truck compartments used to transport PHF
   c. Invoices/shipping documents
   d. Corrective actions (i.e. rejecting food because contaminated or not at a safe food temperature)

(SAMPLE) RECEIVING LOG

Date	Internal Lot Number	Name/Description	Supplier/Manufacturer	Mfr. Lot Number	Quantity	Temperature	P.O. Number	Comments/ Corrective Actions

(SAMPLE) SHIPPING LOG

Date	Product Name	Customer	Address	Quantity	Invoice Number	Comments/Corrective Actions

Food Security Procedures Worksheet

I.   Written Procedures

Food security, as well as food safety, is of concern. Food facilities must be conscious of taking proper precautions to ensure food is not intentionally tampered with. For the protection of the food facility and its customers, written food security procedures must include (at a minimum):

a. **Assigning someone in charge of security.**

   Who is responsible for security:_____

b. **Checking in and identifying visitors and employees.**

   How will you check in and identify visitors:_____

   _____

   How will you identify employees:_____

   _____

c. **Limiting access to food areas**

   How will you restrict access (and ensure proper supervision) to food storage areas:_

   _____

d. **Securing doors and windows**

   How will doors and windows be secured:_____

   _____

e. **Fencing around perimeter if appropriate (and if approved by zoning or other ordinances)**

   Should fencing/walls be installed/maintained around the perimeter of your facility:_____

   _____

f. **Reporting unusual activity to manager/security (train employees to be aware and report suspicious activity).**

What are your procedures for reporting unusual or suspicious activity:_____

_____

g. Securing and testing backflow prevention devices (if you have testable devices).

If applicable, how often will backflow prevention devices be tested and where will you keep the testing records:_____

_____

If applicable, how are your backflow prevention devices secured:_____

_____

h. Securing and storing ice machines inside the food facility

Where will you locate your ice machine and how will you secure it:_____

_____

i. Conducting background checks for new hires

How will you conduct background checks for new hires:_____

_____

j. Creating and training employees on emergency evacuation procedures (include a map and meeting location to account for all employees).

Who is your emergency contact person and the 24-hour number where they can be reached (where will you post that number?):_____

_____

k. Providing adequate lighting around the outside of building.

Is there adequate lighting on the outside of your building:_____

l. Locking trailers unless loading or unloading (never leave filled containers unsupervised).

Who is responsible for loading and unloading trailers(are they kept locked when not loading):_____

_____

m. Restricting access to computer systems (if applicable).

How will you restrict access to computer systems:_____

_____

Guidance for Food Safety and Security for
Wholesale Food Warehouses

The following guidance document was extracted from the United States Food and Drug Administration website:

January 9, 2002
Guidance for Industry

Food Producers, Processors, Transporters, and Retailers:
Food Security Preventive Measures Guidance

This guidance represents the Agency's current thinking on appropriate measures that can be taken by food establishments to minimize the risk of food being subjected to tampering or criminal or terrorist actions. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. This guidance is being issued in accordance with FDA's Good Guidance Practices regulation (21 CFR 10.115; 65 FR 56468; September 19, 2000).

This guidance is designed as an aid to operators of food establishments (i.e. firms that produce, process, store, repack, re-label, distribute, or transport food or food ingredients or that prepare or distribute food at retail). It identifies preventive measures that they can take to minimize the risk that food under their control will be subject to tampering or criminal or terrorist actions. It is relevant to all sectors of the food system (i.e., from farm-to-table), including farms, aquaculture facilities, fishing vessels, producers, transportation operations, processing facilities, packing facilities, warehouses, and retail and food-service establishments. Operators of food establishments are encouraged to review their current procedures and controls in light of the potential for tampering or criminal or terrorist actions and make appropriate improvements. This guidance is designed to focus operators sequentially on each segment of the farm-to-table system that is within their control, to minimize the risk of tampering or criminal or terrorist action at each segment. Implementing enhanced preventive measures requires the commitment of management and employees to be successful and, therefore, both should participate in their development and review.

This guidance is divided into seven sections that relate to individual components of a food establishment operation: management of food security; physical security; employees; computer systems; raw materials and packaging; operations; and finished products. It also covers security strategies and evaluation of the security system. Not all of the guidance contained in this document is appropriate or practical for every food establishment. Operators should review the guidance in each section that relates to a component of their operation, and assess which preventive measures are suitable for their operation. A process called Operational Risk Management (ORM) may also help operators prioritize the preventive measures that are most likely to have the greatest impact on reducing the risk of tampering or criminal or terrorist actions against food under their control (See: Food Safety and Security: Operational Risk Management

Systems Approach, November 26, 2001; www.cfsan.fda.gov).
Food Establishment Operations.

MANAGEMENT OF FOOD SECURITY

Food establishment operators should consider:

Security procedures

- assigning responsibility for security to qualified individual(s)

- encouraging all staff to be alert to any signs of tampering with product or equipment, other unusual situations. or areas that may be vulnerable to tampering, and alerting identified management !!bout any findings (e.g.. providing training, instituting a system of rewards. building into job performance standards)

Investigation of suspicious activity

- immediately investigating all information about suspicious activity
- alerting local law enforcement about all suspected criminal activity Supervision
- providing an appropriate level of supervision to all employees, including cleaning and maintenance staff. contract workers, data entry and computer support staff. And especially new employees
- conducting daily security checks of the premises for signs of tampering with product or equipment. other unusual situations, or areas that may be vulnerable to tampering Mail/packages
- implementing procedures to ensure the security of incoming mail and packages
(e.g.. securing mailroom. visual or x-ray mail package screening)

Physical facility

Food establishment operators should consider: **Visitors**

- inspecting incoming and outgoing vehicles for suspicious. inappropriate or unusual items or activity
- restricting entry to the establishment (e.g.. checking in and out at security or reception. requiring proof of identity, issuing visitors badges -collected upon departure)
- ensuring that there is a valid reason for the visit before providing access to the facility -beware of unsolicited visitors
- restricting access to food handling and storage areas (e.g., accompanying visitors, unless they are otherwise specifically authorized)
- restricting access to locker rooms
- applying the above procedures to everyone, including contractors, supplier - representatives, truck drivers, customers, couriers, third-party auditors, regulators, reporters, visitors, etc.

Physical security

- protecting perimeter access with fencing or other appropriate deterrent .securing doors (including freight loading doors), windows, roof openings/hatches, vent openings, trailer bodies, tanker trucks, railcars, and bulk storage tanks for liquids, solids, and compressed gases, to the extent possible (e.g., using locks, "jimmy plates," seals, alarms, intrusion detection sensors, guards, monitored video surveillance

[remember to consult any relevant federal, state or local fire or occupational safety codes before making any changes])

- using metal or metal-clad doors to the extent possible, especially when the facility is not in operation (remember to consult any relevant federal, state or local fire or occupational safety codes before making any changes)
- minimizing the number of entrances to restricted areas (remember to consult any relevant federal, state or local fire or occupational safety codes before making any changes)
- accounting for all keys to establishment
- using security patrols (uniformed and/or plain-clothed) and video surveillance, where appropriate
- minimizing places that could be used to hide temporarily intentional contaminants

(e.g., minimizing nooks and crannies

- providing adequate interior and exterior lighting, including emergency lighting
- implementing a system of controlling vehicles authorized to park on the premises

(e.g., using placards, decals, key cards, cipher locks)

Laboratory safety

- restricting access to the laboratory (e.g., using key cards or cipher locks [remember to consult any relevant federal, state or local fire or occupational safety codes before making any changes)
- restricting laboratory materials to the laboratory, except as needed for sampling or other appropriate activities
- restricting access (e.g., using locks, seals, alarms, key cards, cipher locks) to sensitive materials (e.g., reagents and bacterial, drug, and toxin positive controls)
- assigning responsibility for integrity of positive controls to a qualified individual
- keeping track of reagents and positive controls .investigating missing reagents or positive controls or other irregularities outside a pre- determined normal range of variability immediately, and alerting local law enforcement about unresolved problems, when appropriate Storage and use of hazardous chemicals (e.g., cleaning and sanitizing agents, pesticides, processing aids)
- changing combinations and/or collecting the retired key card when an employee is terminated, either voluntarily or involuntarily, and additionally as needed to maintain security
- reassessing levels of access for all employees periodically

Personal items

- restricting personal items allowed in establishment
- preventing workers from bringing personal items (e.g., lunch containers, purses) into food handling areas
- establishing policy and providing for regular inspection of contents of employee lockers (e.g., provide metal mesh lockers, company-issued locks), bags, and vehicles when on company property

Training in food security procedures

- providing food security training to all new employees, including information on how to prevent, detect, and respond to tampering or criminal or terrorist activity
- providing periodic reminders of the importance of security procedures
- ensuring employee buy-in (e.g., involving employees in food security planning, demonstrating the importance of security procedures to the employees themselves)

Unusual behavior

- watching for unusual behavior by new employees or workers (e.g., workers who stay unusually late after the end of their shift, arrive unusually early, access files/information/areas of the facility outside of the areas of their responsibility; remove documents from the facility; ask questions on sensitive subjects; bring cameras to work)

Computer systems

Food establishment operators should consider: **Access**

- restricting access to computer process control systems and critical data systems to those with appropriate clearance (e.g., using passwords, firewalls)
- eliminating computer access to past employees immediately upon voluntary or involuntary termination
- establishing a system of traceability of computer transactions
- reviewing the adequacy of procedures for backing up critical computer-based data systems
- validating the computer security system

Raw materials and packaging

Food establishment operators should consider: **Suppliers**
- using only known, appropriately licensed or permitted (where applicable) sources for all ingredients, compressed gas, packaging, and labels
- taking steps to ensure that suppliers and transporters practice appropriate food security measures (e.g., auditing for compliance with food security measures that are contained in purchase and shipping contracts or letters of credit)

- authenticating labeling and packaging configuration in advance of receipt of shipment
- inspecting incoming ingredients, compressed gas, packaging, labels, and product returns for signs of tampering (e.g., abnormal powders, liquids, or odors) or counterfeiting (inappropriate product identity, labeling, product lot coding or specifications), where appropriate
- evaluating the utility of testing incoming ingredients, compressed gas, packaging, labels, and product returns for detecting tampering or criminal or terrorist activity
- requesting locked and sealed vehicles/containers/railcars, obtaining the seal number from the supplier, and verifying upon receipt- make arrangements to maintain the chain of custody when a seal is broken for inspection by a governmental agency
- establishing quarantine and release procedures
- reconciling the amount received with the amount ordered and the amount listed on the invoice and shipping documents, taking into account any sampling performed prior to receipt
- supervising off-loading of incoming ingredients, compressed gas, packaging, labels, and product returns
- alerting local law enforcement about evidence of tampering or counterfeiting
- keeping track of ingredients, compressed gas, packaging, labels, salvage products, rework products, and product returns
- investigating missing or extra stock or other irregularities outside a pre-determined normal range of variability and reporting unresolved problems to local law enforcement, when appropriate
- destroying outdated or discarded product labels

Operations

Food establishment operators should consider: **Security of water**

- securing water wells, hydrants, storage and handling facilities
- ensuring that water systems and trucks are equipped with backflow prevention
- testing for potability regularly, as well as randomly, and being alert to changes in the profile of the results
- chlorinating water systems and monitoring chlorination equipment
- maintaining contact with the public water provider to be alerted to problems
- identifying alternate sources of potable water (e.g., trucking from an approved source, treating on-site or maintaining on-site storage)

Security of plant air

- securing access to air intake points for the facility, to the extent possible (e.g., using fences, sensors, guards, video surveillance)
- examining air intake points for physical integrity routinely

Finished Products

Food establishments should consider: **Security of finished products**

- keeping track of finished products
- investigating missing or extra stock or other irregularities outside a predetermined normal range of variation and alerting local law enforcement about unresolved problems, when appropriate
- ensuring that public storage warehousing and shipping (vehicles and vessels) practice appropriate security measures (e.g., auditing for compliance with food security measures that are contained in contracts or letters of guarantee)
- performing random inspection of storage facilities, vehicles, and vessels
- requesting locked and sealed vehicles/containers/railcars and providing the seal number to the consignee (remember to consult any relevant federal, state or local fire or occupational safety codes before making any changes)
- advising sales staff to be on the lookout for counterfeit products during visits to customers and alerting management if any problems are detected
- evaluating the utility of finished product testing for detecting tampering or criminal or terrorist activity
- monitoring closely the serving of foods in open display areas (e.g. salad bars, open bulk containers)

Security Strategies

Food establishment operators should consider: **Response to tampering or criminal or terrorist event**

- having a strategy for triaging the event
- planning for emergency evacuation, including preventing security breaches during evacuation
- identifying critical decision-makers
- identifying management that employees should alert about potential security problems
- identifying 24-hour contact information for local, state, and federal police/fire/rescue/government agencies
- identifying a media spokesperson
- having generic press statements and background information

Recall strategy

- identifying the person responsible, and a back-up
- providing for proper disposition of recalled product
- identifying customer contacts, addresses and phone numbers

Additional steps

- maintaining any floor or flow plan in a secure, off-site location
- making employees aware of internal, fire, and police emergency phone numbers
- becoming familiar with the emergency response system and the Emergency Command Center operations in the state in which the facility is located
- making employees aware of the company officials to alert about potential security problems, and where they can be reached

Evaluation:

Food establishment operators should consider: **Evaluation program**

- evaluating the lessons learned from past tampering or terrorist events
- annually reviewing and testing the effectiveness of strategies (e.g., conducting mock criminal, terrorist or tampering event and mock recall, challenging computer security system) and revising accordingly -using third party or in-house security expert
- performing routine and random food security inspections of facility (including receiving and warehousing areas and intrusion detection system) -using third party or in-house security expert
- verifying that security contractors are doing an adequate job

Emergency Point of Contact:
Local law enforcement

San Diego County Department of Environmental Health
(619) 338-2356

U.S. Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

If a food establishment operator suspects that any of his/her products that are regulated by the FDA have been subject to tampering or criminal or terrorist action, he/she should notify the FDA 24-hour emergency number at 301-443-1240 or call their local FDA District Office. FDA District Office telephone numbers are listed at http://www.fda.gov/ora/inspect-ref/iom/iomoradir.html. The operator should also notify local law enforcement.
Field Instructions for "Food Producers, Processors, Transporters and Retailers: Food Security Preventive Measures Guidance" and "Importers and Filers: Food Security Preventive Measures Guidance" June 2002
Food Safety and Terrorism Foods Home FDA Home Search/Subject Index Disclaimers & Privacy Policy I Accessibility/Help Hypertext updated by cjrn/dms 2002-JUL-03

Notes

Wholesale Food Warehouse Recall Plan Worksheet

I.   INTRODUCTION

Food warehouses are a critical part of the food distribution system in the United States. Being prepared to cooperate in food recalls, trace backs, and similar food notifications is an essential element in a good business plan. Recall preparation includes developing a Recall Plan and periodically reviewing the plan and its elements to make sure they are current and accurate.   A recall is a voluntary action taken by growers, packers, distributors, processors, and others to remove consumer products in commerce that are possibly injurious to human health.

II.   SCOPE

The following guidelines are intended to assist food warehouse owners and managers in preparing a recall plan. A recall plan is a written collection of documents, or sub plans (placing them in a binder or folder is recommended), that together answer the following questions if you have to recall a food product:

1. What are the products sold to you that are part of the recall?
2. Who did you distribute the recalled product to?
3. How will you give notice of your recall?
4. What procedure will you follow in recalling your food products?
5. What procedure will you use for identifying, collecting, warehousing, and controlling recalled products?
6. How will you determine your recalls effectiveness?

III.   STEPS TO PREPARE A RECALL PLAN

A. Assemble documents or ensure availability of information that you will need to be included in the Recall Plan:

1. Product inventory (product name, item/code/lot number, quantity, expire/use-by dates, location in warehouse) with suppliers' names, addresses, telephone numbers, fax numbers.
2. Customer information including names, addresses, telephone numbers, and fax numbers.
3. Distribution information (what products, quantities, customer, date of delivery)

B. Identify individuals in the company that will be responsible for carrying out food recall actions. Include contact information for each individual, including after hours phone numbers.
C. Develop a procedure for identifying (see Section IV. Model Recall Worksheet and Procedures), collecting, warehousing, and controlling suspect products.

D. Train employees on the Food Recall Plan.

IV. MODEL RECALL WORKSHEET AND PROCEDURES

A. <u>RECALL INFORMATION WORKSHEET</u>. The following information should be collected when a supplier or agency notifies you of a recall:

1. Type of recall:

    _____Class I (removal of products that present a threat to consumer health or safety)

    _____Class II (removal of products that pose a potential threat to health or safety or legal violation)

    _____Class III (health hazard remote or non-existent)

2. Other food withdrawal action:

    _____Market withdrawal
    _____Stock recovery
    _____Product hold

3. Product Involved (product name/description, item/code/lot number, size, use-by date, etc.): _____

4. Estimated amount on the market
    _____

5. Name, address, phone, and contact information of manufacturer, re-packer, or distributor

    _____

    _____

    _____

    _____

6. Who is the recalling firm
    _____

    _____

_____

7. Reason for and scope of recall (or other action)

   _____

   _____

8. Injuries or deaths attributed to recall (if applicable)

   _____

   _____

9. How firm/agency learned about the problem (attach copies of notifications and phone notes)

   _____

   _____

10. Action to be taken by your facility (disposal or return of product)

    _____

    _____

11. Who should consumer's contact to find out more about the recall.

    _____

    _____

B. <u>MODEL PROCEDURE TO IMPLEMENT RECALL</u>

1. Company employees with recall assignments will meet to discuss recall information listed on above Recall Information Worksheet. Review Recall Plan and implementation. Discuss documentation of implementation of recall.

2. Conduct search of existing inventory for recalled product, and if located, place product in specially designated recall area with sign stating, " HOLD - DO NOT SHIP"

3. Notify customers that they received recalled product with information from Recall Worksheet by telephone, fax, and certified mail. Provide information on return policy and procedure.   Confirm recall plan and storage procedure with employees responsible for receipt of returned product (products involved in class I recalls require notification to customers within 24 hours).

4. Notify recalling firm of details of recalled product being held. Get information on procedures for return or disposal of held product.

5. Monitor progress of recall by contacting supplier and or local, state or federal agency involved.

6. Collect and retain documentation and information on implementation of recall.

7. After the recall is completed, review the implementation of the recall to identify "lessons learned". This information will help identify weaknesses in your recall procedures that can be strengthened in order to improve the recall process next time one is issued.

Please note that this is intended to be a guideline and may not be all- inclusive for every situation.

In the case of reported illness or death, contact the San Diego County Department of Environmental Health at (619) 338-2356. For other recall assistance, please call (619) 338-2379 or e-mail fhdutyeh@sdcounty.ca.gov

FACT SHEET
Food Recalls

The following is modeled from the food recall fact sheet posted on the United States Department of Agriculture (USDA) website:

What is a food recall?

A food recall is a voluntary action by a manufacturer or distributor to protect the public from products that may cause health problems or possible death.

Who regulates food products?

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) inspects and regulates meat and poultry products and processed eggs (eggs that have been removed from their shells for further processing) produced in federally inspected plants. FSIS is responsible for ensuring that these products are safe, wholesome, and accurately labeled. All other food products are regulated by the Food and Drug Administration (FDA).

What is the purpose of a recall?

The purpose of a recall is to remove food from commerce when there is reason to believe it may be adulterated (injurious to health or unfit for human consumption) or misbranded (false or misleading labeling and/or packaging).

Who decides when a recall is necessary?

All recalls are voluntary. They may be initiated by the manufacturer or distributor of the food or at the request of FSIS or FDA. If a company refuses to recall its product, then FSIS has the legal authority to detain and/or seize meat and poultry product(s) in commerce when there is reason to believe they are hazardous to public health or if other consumer protection requirements are not met.

How are unsafe products discovered?

Unsafe or improperly labeled food can come to the attention of FSIS or FDA in many different ways:

- The company that manufactured or distributed the food informs agency of the situation.
- The discovery is made through test results received by the agency as part of its sampling program.

- Field inspectors and compliance officers, in the course of their routine duties, gather information and make observations that may lead to the discovery of unsafe or improperly labeled foods.
- Agencies may learn of unsafe food from consumer complaints, epidemiological data submitted by state or local public health departments, other agencies.

As soon as an agency learns that a possibly unsafe or mislabeled food is in commerce, it conducts a preliminary investigation to determine whether a recall of the food is necessary.

The preliminary investigation may include some or all of the following steps:

- Collecting and verifying information about the suspected food;
- Documenting a chronology of events;
- Contacting the manufacturer of the food for more information;
- Discussions with field inspection and compliance personnel;
- Interviewing a consumer who allegedly became ill or injured from eating the food;
- Collecting and analyzing food samples; and
- Contacting state and local health departments.

What is the role of the USDA and the FDA?

During a food recall, the public health is protected by ensuring that potentially hazardous foods are removed from commerce as quickly as possible. The primary role of regulatory agencies is to closely monitor the effectiveness of the firm's recall procedures and to provide scientific and technical advice.

What are the various types of recalls?

Class I -A Class I recall involves a health hazard situation where there is a reasonable probability that eating the food will cause health problems or death. Meat that is contaminated with pathogenic bacteria, such as Listeria monocytogenes in a ready-to-eat product or Escherichia coli 0157:H7 in raw ground beef, would be subject to a Class I recall. Also, adding Class I allergens, such as peanuts or eggs, as an ingredient in processed meat without listing them on the label would justify a Class I recall.

Class II -A Class II recall involves a potential health hazard situation where there is a remote probability of adverse health consequences from eating the food. An example of a Class II recall would be the presence of dry milk, a Class II allergen, as an ingredient in sausage without mention of the dry milk on the label.

Class III -A Class III recall involves a situation when eating the food will not cause adverse health consequences. An example would be improperly labeled processed meat in which added water is not listed on the label as required by Federal regulations. In addition to determining the class of the recall, the appropriate agency verifies that the company has identified production and distribution information to facilitate the recall.

What are other food withdrawal actions?

Other food withdrawal actions can include stock recovery, market withdrawal, or product hold. These actions may be initiated by a manufacturer or supplier to address quality control or other issues not likely to impact the public's health.

How does the USDA and the FDA ensure that products subject to the recall are returned?

Field enforcement personnel conduct "effectiveness checks" to ensure that the firm makes all reasonable efforts to retrieve the recalled meat or poultry .A sufficient number of effectiveness checks are made to verify that the recall is conducted in an effective manner, and that the firm locating, retrieving, controlling, and disposing of the food is acting according to regulatory requirements.

After the agency has determined that the recalling firm has made all reasonable efforts to retrieve and appropriately dispose of the recalled food, the firm is officially notified by letter that the recall is completed and no further action is expected.

Does USDA keep documentation on recalls?
The Recall Management Division maintains comprehensive case
files for all recalls coordinated by FSIS (USDA).

Where can consumers find information on recalls of food products?
For additional information on recalls of meat and poultry products, consumers may contact the following: .Open Federal Cases area of the Web site USDA Meat and Poultry Hotline 1-800-535-4555 Email: mphotllne.fsis@usda.gov

- For information on recalls of all other foods, please contact FDA's Center for Food Safety and Applied Nutrition's Outreach and Information Center at 1-888-SAFE FOOD (1-888-723-3366).
- Additional information is also available on the Web site: www.foodsafety.gov .

Where can the public find other information on the recall process?
For additional Information on the recall process, consumers may want to read the following documents available through FSIS:

- Recall of Meat and Poultry Products, FSIS Directive 8080.1,Rev.3(Jan 19,2000)PDF
- Product Recall Guidelines for Firms, FSIS Directive 8080.1, Rev. 3, Amendment 2 (Jan 19,2000). I PDF .Improving Recalls at the Food Safety and Inspection Service, Report of the Recall Policy Working Group (Aug 1998). PDF
- A Review of Recall Policies at the Food Safety and Inspection Service, The Product Recall Research Group, Directed by Dirk C. Gibson, Ph.D. (Jun 1, 2000).
- Evaluation Report -FSIS Recall Notification and Industry Guidance, Evaluation and Analysis Division, OPPDE (Sep 2000, PDF Only)

SAMPLE COMPANY ISSUED RECALL PRESS RELEASE

The following sample press release was extracted from the FDA Website:

Recall-- Firm Press Release
FDA posts press releases and other notices of recalls and market withdrawals from the firms involved as a service to consumers, the media, and other interested parties. FDA does not endorse either the product or the company.
Stonington Sea Products Recalls Smoked Salmon Because of Possible Health Risk

Contact:
Lynn Jebbia
207-288-2742
FOR IMMEDIATE RELEASE --Stonington, ME --May 12, 2004

--Stonington Sea Products of Stonington, ME is recalling a small, seventy pound batch of Cold Smoked Salmon, packaged in retail packages of 4 oz., 8 OZ., 12 OZ., and bulk in Sliced and Unsliced Sides with sell by dates of 5/8/2004, because it has the potential to be contaminated with Listeria monocytogenes, an organism which can cause serious and sometimes fatal infections in young children, frail or elderly people, and others with weakened immune systems. Although healthy individuals may suffer only short-term symptoms such as high fever, severe headache, stiffness, nausea, abdominal pain and diarrhea, Listeria infection can cause miscarriages and stillbirths among pregnant women.
Cold Smoked Salmon was distributed to three retail stores, one each in Maine, Massachusetts and New York.

It was also distributed to three restaurants and via mail order to four customers. All customers have been notified and no illnesses have been reported to date.
The product is in plastic cryovac bags with the Stonington Sea Products label. This recall was a result of a sampling program carried out by the FDA on a recent inspection. Two batches of cold smoked salmon were tested. A sample from one batch tested positive for listeria and no listeria was found in a sample taken from the second batch. Stonington Sea Products performs regular testing for listeria and it has never been detected prior to this batch. The company has reviewed its plant procedures and increased its testing schedules to eliminate the reoccurrence of this problem.
Consumers who have purchased Cold Smoked Salmon with sell by date of 5/8/2004 are urged to return it to the place of purchase for a full refund. Consumers with questions may contact the company at 1-888-402-2729.
####

Notes

Traceback/Traceforward Procedures Worksheet

I. **System for Tracing Forward and Tracing Back Foods**

It is important to establish a procedure to identify foods by lot number, date received, and status of food item (on hold, rejected, released) (i.e., bar codes, stamps, stickers, tags, etc). This helps in tracing any problems that develop. If you do not have a system already in place, consider ways to develop lot identification in your operation. It is always better to be proactive and prepared then reactive and confused, especially in an emergency situation.

a. What system do you have in place to trace food items back to their
source:_____

_____

b. What system do you have in place to trace food items distributed to the retailer
or other wholesale facility:_____

_____

_____

c. How will you maintain records:_____

_____

d. Does this system fit into your recall procedures plan:_____

Notes

Employee Practices Procedures Worksheet

I.   Food Worker Training

Food worker knowledge is the foundation to instituting good practices for your facility's operation. All people who work with food in your facility should have a good working knowledge of basic food safety and hygiene principles. Depending on the situation, formal presentations, one-on-one instruction, or demonstrations (proper hand washing demonstration) may be appropriate. Written procedures should include (at a minimum):

a.   Conducting food worker food safety training within 10 days of hire (training materials can include Level One wholesale training or equivalent).

How and when will you conduct food worker food safety training:_____

_____

_____

b.   Conducting a food safety test (70% is passing grade) at least once every three years.

Who will conduct the training and how will you administer the test issued by the County:_____

_____

c.   Renewing training once each year.

When will you conduct refresher training (a certain month, at employee evaluation, etc.):_____

_____

d.   Keeping an employee training log.

Where will you keep employee training records:_____

_____

II.   Employee Health and Hygiene

Written Employee Health & Hygiene Procedures should include (at a minimum):

a.   Providing hand-washing signs at hand wash sinks.

Where will you post hand-washing signs:_____

b.   Teaching employees how and when to wash hands.

When and how will you teach employees to wash their hands:_____

_____

c.   Ensuring employees wear clean clothes and have employee lockers or other personal storage areas.

Where will employees store their personal belongings:_____

_____

d.   Having procedures for managing sick employees

What is your policy for managing sick employees (i.e. reassigning sick employees who handle unpackaged food, etc):_____

_____

e.   Providing gloves/band aids for employees with cuts or lesions.

What is your policy for managing employees with cuts or lesions on their hands:_____

_____

f.   Providing a clean, separate employee break/lunch area.

Where is your employee lunch/break area located:_____

_____

Who is responsible for cleaning the employee lunch/break area and when will cleaning be conducted:_____

_____

g.   Having a policy of no smoking, eating, or drinking in food areas.

What is your policy regarding smoking, eating, or drinking in food areas (it is ok to drink from an enclosed drink container in food areas): _____

_____

Notes

Sanitation Operating Procedures (SOPs)
Procedures Worksheet

I.   Master Cleaning Schedule, Cleaning Logs, and Water Sampling

The warehouse facilities must be kept clean and in good repair. Effective cleaning must also be conducted in a manner that does not result in contamination of foods or food related equipment or utensils.   Your SOPs should include (at a minimum):

a. A daily cleaning/maintenance log for toilet rooms (clean, maintained, stocked).
b. Water sample results if water is from a well (particularly if ice is made at the facility). Water sampling should take place in accordance with applicable laws, but should be conducted at least twice per year.
c. A master cleaning and maintenance schedule and procedures.

II.   Written Procedures

Written procedures should include (at a minimum):

a. A daily cleaning/maintenance log for toilet rooms (clean, maintained, and stocked).

Who will clean and stock toilet rooms daily?_____

Where will you post the cleaning log?_____

b. Water sample results if water is from a well (particularly if ice is made at the facility). This is generally covered under a state or local permit, but you will need to verify safety of your water supply with the regulatory agency.

Who will take your water samples:_____

What is your water permit number (if on a well):_____

_____

How often will water samples be taken:_____

c. A master cleaning and maintenance schedule and procedures.

Who is responsible for ensuring cleaning is completed:_____

What are your procedures for cleaning and maintaining (at least) the following:

Forklifts and pallet jacks:_____

_____

Overhead pipes (not leaking):_____

_____

Pallets, skids, bins, totes:_____

_____

Litter or ponding water, outside or inside facility:_____

_____

Food transportation compartments:_____

_____

Refrigerators/coolers (floors, walls, ceilings, coils):_____

_____

Ice machine/ice scoops or shovels:_____

_____

Drains and equipment:_____

_____

Refuse pick up frequency:_____

_____

Refuse bin/compactor area:_____

_____

Other equipment or facilities needing cleaning or maintaining:_____

_____

_____

III.   Records

   a. Toilet room cleaning/maintenance log.
   b. Water Sample-testing results.

Notes

Pest/Vermin Control Procedures Worksheet

I. Written Procedures

Pests/vermin, such as rodents, flying insects, crawling insects, and others must be kept out of a food facility. Having a proactive pest control plan in place will help avoid contamination of food and product loss. The following are suggestions on what an effective pest control program should include:

a. Using a Licensed Pest Control Operator (PCO) [include environmental assessment as part of PCO contract (findings, recommendations, corrective actions)].

Who is your PCO:_____

What is your PCO license number:_____

Does your PCO conduct inspections and provide recommendations as part of your service contract:_____

b. Using only approved pesticides (check Material Safety Data Sheets (MSDS)).

Have you reviewed the MSDS's for all pesticides used on the premises:_____

Are pesticides applied according to the use intended on the label:_____

c. Numbering and mapping all devices/bait stations.

How are bait stations/devices numbered and mapped:_____

_____

d. Weekly log (should be at least daily if a problem is noted. It is also recommended that produce warehouses or farm packing operations conduct daily checks).

Who is responsible for checks of bait stations/devices both inside and outside of the facility:_____

How will checks be logged:_____

e. Servicing inside and outside no less than once per month (do not use bait stations inside).

How often does your PCO service your facility:_____

f. Eliminating rodent breeding or harborage conditions(standing/pooling water, accumulation of trash/litter, clutter, spilled food items, potential nesting areas, etc.)

Does your monthly self-inspection procedures include monitoring for and eliminating rodent breeding and/or harborage conditions:_____

What will you monitor for to ensure no rodent breeding or harborage conditions are present on your premises (see above for guidance):_____

_____

_____

g. Maintaining an unobstructed 12-18 inch distance from walls to pallets (paint a stripe).

How will you maintain an unobstructed space of at least 12-18 inches between walls and pallets (or other food/nonfood storage):_____

_____

h. Vermin-proofing doors and screens (no holes in walls, screened windows, no gaps under doors greater than ¼ inch)

Do you ensure that when doors are closed, they are closed all the way to the floor:_____

How will you ensure your facility is vermin-proof:_____

_____

_____

II. Records

a. Pest control service receipts (include environmental assessment as part of service agreement).
b. Map of all devices/bait stations.
c. Weekly pest control inspection logs.

Notes

Self-Inspection/Verification Procedures Worksheet

I.   Self-Inspection Procedures

Self-inspections help to ensure a wholesale food warehouse is operating in accordance with its risk control plan. The measures put in place by a facility to control risks will go a long way to ensuring food safety and security. Having a risk control system in place will also assist in identifying problem areas that need to be corrected, helping facilities operate more efficiently, and letting your customers know that you have a comprehensive system in place to assure the food they receive is safe and unadulterated.

Self-inspection logs should include (at a minimum):

a. Weekly pest control inspection log

b. Monthly self-inspection checklist (see sample self-inspection form provided).

Who will conduct the monthly self-inspection:_____

Is the designated person trained in food safety and your risk control plan:_____

II.   Verification Procedures

Ensuring reasonable compliance with your risk control plan by a neutral outside source is important because it provides unbiased assessment of your facility's operations. The San Diego County Department of Environmental Health (DEH) or other outside entity can verify your adherence to your plan. DEH will verify your adherence to your plan twice per year. After each assessment, DEH will grade your facility as A, B, or C. This program is similar to the restaurant grading system that has been in place in San Diego
County since 1946. An inspection report with a point value grading system will be used. 90-100% = A, 80-89% = B, and 70-79% = C.

a. Who will verify adherence to your risk control plan:_____

b. What credentials does your verifier have to ensure adequate food safety knowledge [DEH staff have advanced science-based degrees and pass a comprehensive state examination to become Registered Environmental Health Specialists (REHS)]:

_____

_____

WHOLESALE FOOD WAREHOUSE
RISK CONTROL PLAN
SELF-INSPECTION CHECKLIST

The items listed below represent the major areas evaluated during a routine wholesale food warehouse inspection. This checklist is designed to assist the facility operator in evaluating the condition of their facility and adherence to a risk control plan. Go through this list and "check off" those items that you believe are in compliance. Those not "checked off" need to be corrected. Guidelines to assist in determining which violations are imminent health hazards are attached at the end of this document. We hope this checklist will help you maintain your facility at the highest standards in order to assure the safety and security of the food supply.

TEMPERATURE CONTROL

Safe Temperature of Potentially Hazardous Foods (such as meats, poultry, eggs, fish, shellfish, dairy products or foods containing dairy products, sliced melons, or cooked produce)

❑ 41º F or below (or 140 º F or above)

❑ 45 º F molluscan shellfish, pasteurized milk or milk products in original containers, raw shell eggs.

❑ Frozen foods frozen

Temperature Control Logs

❑ Refrigeration/cooler units

❑ Receiving temperatures logged

❑ Transportation (Pre-cooling) temperatures logged

❑ Shipping temperatures logged

Thermometer Calibration

❑ Thermometers Calibrated

❑ Calibration dates logged

VERIFYING APPROVED SOURCES

❑ Food from an approved source

❑ Assurance of approved food source provided to your customers.

FOOD STORAGE

❑ Adequate Storage Space

❑ Unobstructed Aisles

❑ Food off floor 6 inches or on pallets (Equipment such as pallet jacks or forklifts available on demand to move the pallets)

❑ Chemicals and cleaning items separate from food.

❑ Poisonous/toxic chemicals (not held for sale) stored in a secured location.

❑ Raw animal foods separate from ready-to-eat foods

❑ Food protected from contamination (proper packaging and coverage).

❑ Separate, labeled storage area for salvage items.

❑ Handling salvaged, expired, damaged, or contaminated foods (include timely disposal of damaged, spoiled, or expired products) according to procedures.

❑ Rotating stock to ensure First In – First Out (FIFO).

❑ Providing adequate lighting and ventilation.

❑ Assuring food received is labeled.

❑ Cleaning and organizing food storage areas.

❑ Maintaining an unobstructed, clearly delineated, space that is 12 to 18 inches between walls and stored items.

RECEIVING, TRANSPORTATION & DELIVERY

❑ Safe Transportation of Foods (at safe temperatures, separate from chemicals, free of insects or rodents, clean and sanitary conditions)

❑ Record kept of rejected food items received.

❑ Shellfish tags kept for 90 days.

FOOD SECURITY

❑ Visitors log maintained

❑ Access to food areas limited.

❑ Doors and windows able to be secured.

❑ Backflow prevention devices tested.

❑ Ice machine secured (restricted access).

❑ Background checks for new hires.

❑ Employees trained on emergency evacuation procedures.

❑ Adequate lighting outside of building.

❑ Trailers locked/secured when not loading.

❑ Access to computer systems restricted.

RECALL PLAN

❑ Recall plan current.

❑ Emergency contact phone numbers current.

❑ Recall records maintained.

TRACEBACK/TRACEFORWARD

❑ Trace forward system in place.

❑ Trace back system in place.

EMPLOYEE PRACTICES

❑ Food worker training current.

❑ Employee lockers/storage area provided.

❑ Procedures in place to manage sick employees.

❑ Sanitary Practices/No Expectorating (spitting)/No Smoking in Food Areas

❑ Clean hands.

❑ Clean lunch area.

SANITATION

❑ Safe Ice

❑ Ice machine, ice scoops and shovels clean.

❑ Daily cleaning/maintenance log maintained.

❑ Forklifts and pallet jacks clean.

❑ Overhead pipes not leaking.

❑ Pallets, skids, bins, totes clean

❑ No litter or ponding water, outside or inside facility.

❑ Food transportation compartments clean.

❑ Refrigerators/coolers clean and good repair.

❑ Drains and equipment clean.

❑ Refuse pickup frequency adequate.

❑ Refuse bin/compactor area clean.

PEST/VERMIN CONTROL

❑ No insects, rodents, animals, or birds

❑ No breeding or harborage conditions for Insects or rodents (such as clutter, trash, pooling water or leaky plumbing, damaged/open food containers)

❑ Vermin-Proof (holes in floors or walls or ceilings, no screens on openable windows, or gaps larger than ¼ inch under or around openings to the outside)

❑ Pest Control Operator licensed.

❑ Approved pesticides used.

❑ Pest/vermin control service at least monthly.

WATER SUPPLY AND SEWAGE DISPOSAL

❑ Safe water supply

❑ Proper disposal of sewage/wastewater

- ❑ Floor drains in areas subject to flooding-type cleaning or where operations release water.
- ❑ Warm water of 100 ºF at hand washing sinks
- ❑ Hot water of 120 ºF when a utensil washing sink is required

TOILET ROOMS

- ❑ Dispensers supplied with soap, paper towels, and toilet paper
- ❑ Operable toilet facilities
- ❑ Operable hand washing sinks within or adjacent to toilet rooms.
- ❑ Proper lighting
- ❑ Proper ventilation
- ❑ Hand washing signs posted

FACILITIES

- ❑ Plumbing in good repair
- ❑ Proper disposal of refuse
- ❑ Refuse in leak proof containers with tight-fitting lids
- ❑ Enclosed building of sound construction
- ❑ Utensil washing sinks where handling unpackaged foods or washing or trimming of produce
- ❑ Janitorial facilities (janitorial sink to dispose of mop water and a storage area for cleaning supplies)

EQUIPMENT

- ❑ Walk-In refrigerators/freezers functioning
- ❑ Thermometers in refrigeration units
- ❑ Ice makers located inside building
- ❑ Indirect drainage for ice machines (Indirect drainage means to a floor sink, hub drain. Other methods should be approved by the inspector).

SELF-INSPECTION/VERIFICATION

- ❑ Monthly self-inspection reports kept on file.
- ❑ Regulatory inspection reports kept on file

DOCUMENTATION/RECORD KEEPING

- ❑ Neat, organized filing system
- ❑ Customer complaint file maintained and periodically reviewed.
- ❑ Risk Control Plan
- ❑ Invoices and shipping documents
- ❑ Current approved source verification records.
- ❑ Current approved source verification records.
- ❑ Temperature control logs or computer print outs
- ❑ Thermometer calibration logs
- ❑ Monthly facility self-inspection logs
- ❑ Receiving logs or equivalent
- ❑ Shipping logs or equivalent
- ❑ Employee training records.
- ❑ Cleaning logs and schedules
- ❑ Disposition of salvaged, expired, damaged, or contaminated foods.
- ❑ Documentation and information on implementation of recalls.
- ❑ Water sample testing results (well water)
- ❑ Map of all pest control devices/bait stations.
- ❑ Weekly pest control inspection logs.
- ❑ Pest control service receipts (include environmental assessment as part of service agreement).
- ❑ Regulatory agency inspection reports/verification documentation

OPERATIONS

- ❑ Permits/licenses current
- ❑ Health permit posted
- ❑ Other_____

Comments and Corrective Actions

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Comments and Corrective Actions

_____

Major risk factor violations pose an imminent public health danger and require immediate correction. According to the Centers for Disease Control and Prevention (CDC), they are the most significant risk factors contributing to food-borne illness outbreaks. As such, they are clearly of an imminent public health nature.

Improper Holding Temperatures

Major Violations Include:
- Multiple potentially hazardous foods held at temperatures of 50°F to 130°F without any other intervention.

Minor Violations Include:
- Potentially hazardous foods held at temperatures of 42°F to 49°F or 131°F to 139°F.

As with all temperature situations, time is also a factor. Judgment must be used in cases where food is left out in the minor violation range.

Poor Personal Hygiene of Food Handler

Major Violations Include:
- A food handler sick with Salmonella, Shigella, E. coli 0157:H7, Hepatitis A virus, or any other condition determined by the Health Officer to warrant exclusion or restriction of a food employee.
- Not washing hands when handling unpackaged foods, expectorating (spitting) around food, working with unpackaged food with open cuts, sores, or rashes, or any other condition determined by the local enforcement agency to warrant exclusion or restriction of a food employee.

Contaminated Food/Equipment

Major Violations Include:
- Obvious cross contamination between raw and ready to eat food.
- Physical or chemical contamination of foods.

- Co-mingling of shellfish/improper wet storage of shellfish
- No sanitizer for multiuse utensils.
- Improper ware washer machine temperature.
- Gross contamination to food contact surfaces.

Food From Unsafe Sources

Major Violations Include:
- Any food from an unsafe or unapproved source.

Vermin Infestation

Major Violations Include:
- Active heavy infestations by rodents, insects, birds, or fowl that has resulted in contamination of food contact surfaces and adulteration of foods and warrants immediate closure.

Sewage in Food Facility

Major Violations Include:
- Overflows or back ups of sewage/wastewater into the food facility that can result in contamination of food contact surfaces and adulteration of foods and/or warrants immediate closure.
- Overflowing or clogged grease trap/interceptor.
- No operable toilet facilities.

No Water/Hot Water

Major Violations Include:
- Hot or cold water is not available at all hand washing or utensil washing sinks in the food facility. Note that hand wash sinks should have warm water of at least 100°F. Hot water at utensil washing and mop sinks should not be less than 110°F. Hot water should not be less than what is required to operate the dishwashing machine.
- Contaminated water supply.

Note that this is intended to be a guideline document and may not be all-inclusive as individual facilities and severity of violations can vary from the guidelines established in this document.

Notes

Documentation and Record Keeping Procedures Worksheet

I.   Documentation and Record Keeping Procedures

Documentation and record keeping are important in tracking a facility's operation. An efficient system needs to be in place to ensure records are being properly maintained as outlined in your plan. Records also need to be organized, stored in a secure location, and maintained for an extended period of time. One important concept to remember is, ***if you didn't record it, it didn't happen!***

a. Keep records organized.

Where do keep your records:_____

Who is responsible for maintaining your records:_____

How long will you maintain your records:_____

b. Keep and periodically review a customer complaint file.   Review the file for trends in types of complaints to indicate whether or not there is a problem with a particular food item or practice.

Who maintains your customer complaint file:_____

Where are your customer complaint file records maintained:_____

c. Records that you should maintain (at a minimum):

1. Risk Control Plan
2. Invoices and Shipping documents
3. Verification of approved sources
4. Temperature control logs or computer print outs
5. Thermometer calibration logs
6. Monthly facility self-inspection logs
7. Receiving/transportation/delivery logs
8. Training records.
9. Cleaning logs and schedules
10. Disposition of salvaged, expired, damaged, or contaminated foods.
11. Documentation and information on implementation of recalls.
12. Water sample testing results.
13. Pest control service receipts (include environmental assessment as part of service agreement).
14. Map of all pest control devices/bait stations.
15. Weekly pest control inspection logs.
16. Regulatory agency inspection reports/verification documentation

Notes